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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

PACKLANE, INC.,

Plaintiff

Case No.: 4:23-cv-03496-HSG

BEST & FLANAGAN LLP and
DANIEL L. GRIMSRUD,

Defendants.

**STIPULATION AND ORDER TO
EXTEND MOTION TO TRANSFER
BRIEFING SCHEDULE**

Pursuant to Civil Local Rule 6-1 and 6-2, Plaintiff Packlane, Inc. (“Packlane”) and Defendants Best & Flanagan LLP and Daniel L. Grimsrud (collectively, “Defendants,” and together with Plaintiff, “Parties”) stipulate as follows:

WHEREAS, on September 11, 2023, Defendants filed a Motion for Transfer of Venue to the District of Minnesota Pursuant to 28 U.S.C. § 1404 (ECF No. 14) (“Transfer Motion”), noticed for a hearing date of December 7, 2023;

WHEREAS, Plaintiff’s response to Defendants’ Transfer Motion is currently due by September 25, 2023, and Defendants’ reply is currently due by October 2, 2023;

WHEREAS, the parties have agreed to stipulate to an extension of the briefing schedule given existing obligations in other matters;

WHEREAS, there have been no other time modifications in this case;

1 WHEREAS the extension will not alter the date of any event or any deadline already fixed
2 by Court order, and will not have any effect on the schedule of this case, since the Court has set a
3 case management hearing on October 17, 2023 to consider a case schedule;

4 THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their
5 undersigned counsel, that:
6

7 1. Plaintiff shall oppose Defendants' Transfer Motion to Transfer by October 10,
8 2023; and

9 2. Defendants shall reply to Plaintiff's Opposition by October 17, 2023.
10

11 Dated: September 18, 2023

12 **KAGEN, CASPERSEN & BOGART PLLC**

13 By: /s/ Stuart Kagen
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

/s/ Stuart Kagen
Stuart Kagen

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2023, I electronically filed the foregoing document entitled JOINT STIPULATION TO EXTEND TIME TO RESPOND TO MOTION TO TRANSFER BRIEFING SCHEDULE with the Clerk of the Court for the United States District Court, Northern District of California using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

Dated: September 18, 2023


/s/ Stuart Kagen
Stuart Kagen

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 9/19/2023


HAYWOOD S. GILLIAM, JR.
United States District Judge